

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE - OPELOUSAS DIVISION**

**NEXEN PETROLEUM
U.S.A., INC., ET AL**

CIVIL NO. 6:08CV00812

VERSUS

JUDGE DOHERTY

**ALLIS-CHALMERS RENTALS
SERVICES, L.L.C., ET AL**

MAG. JUDGE METHVIN

NOTICE OF DEPOSITION

PLEASE TAKE NOTICE that counsel for defendants, Cameron International Corporation, Cameron France, S.A.S. and Cooper Cameron Holding (U.K.), Ltd., will take the deposition of an appropriate and knowledgeable representative of Coastal Drilling Company, L.L.C., to be designated pursuant to Fed. R. Civ. Proc. 30(b)(6), for purposes of discovery, as allowed under the Federal Rules of Civil Procedure, on the 3rd day of September 2009 at 10::00 a.m. at the offices of Deutsch, Kerrigan & Stiles, L.L.P., 755 Magazine Street, New Orleans, Louisiana 70130, before a notary public, or some other officer authorized to administer oath, at which time the deponent will be asked to produce, pursuant to an earlier served subpoena duces tecum, and to testify to the following topics, documents and things:

1. All agreements, other documents or information pertaining to use or access to property or other areas to drill the McIlhenny No. 1 well;
2. Preparation of the lease tracts to conduct drilling operations in relation to McIlhenny No. 1 well;
3. All plats or maps for the lease tracts being drilled;
4. All plats or maps for the area where drilling operations were conducted;
5. All surveys or topographical evaluations performed prior to the commencement of drilling operations;
6. All surveys or topographical evaluations performed after the commencement of drilling operations;
7. All photographs or other video recordings made of the area prior to the commencement of drilling operations;
8. All photographs or other video recordings made of the area after the commencement of drilling operations;
9. All evaluations, assessments or other analyses regarding the use of Coastal Drilling Company, L.L.C. Rig No. 21 at this location;
10. All documents or information pertaining to preparation of the site related to the McIlhenny No. 1 well, including the excavation or dredging of any locations;
11. Steps taken to locate Coastal Drilling Company, L.L.C. Rig No. 21 at the site of McIlhenny No. 1 well;
12. All documents or information pertaining to the physical and operational attributes of Coastal Drilling Company, L.L.C. Rig No. 21, including its physical features, properties, capabilities and components;

13. All contracts, written agreements or information for the drilling of McIlhenny No. 1 well, including, but not limited to, any contracts or written agreements for site preparation, excavation and dredging, in addition to drilling;
14. All documents or information pertaining to the mobilization and operation of Coastal Drilling Company, L.L.C. Rig No. 21;
15. All documents or information identifying or pertaining to the well control configuration and equipment used in connection with the drilling of McIlhenny No. 1 well;
16. All documents or information related to the procurement of the well control equipment used in connection with the drilling of the McIlhenny No. 1 well;
17. All documents or information related to the use of the well control equipment used in connection with the drilling of the McIlhenny No. 1 well prior to the commencement of drilling operations on McIlHenny No. 1 well;
18. All documents or information pertaining to damages allegedly sustained and the survey or appraisal of damages allegedly sustained;
19. All documents supporting the assertion of maritime subject-matter jurisdiction;
20. All documents demonstrating that Coastal Drilling Company Rig No. 21 was on the navigable waters of the United States;
21. All documents demonstrating a disruption in maritime commerce on account of the loss of control incident; and
22. All documents demonstrating that the drilling of McIlhenny No. 1 well and the loss of control incident bore a significant relationship to traditional maritime activity.

All counsel are invited to attend and participate as you deem appropriate.

Respectfully submitted,

/s/ John F. Fay, Jr.

Howard L. Murphy (Bar #9844)

John F. Fay, Jr. (Bar #1870)

DEUTSCH, KERRIGAN & STILES, L.L.P.

755 Magazine Street

New Orleans, Louisiana 70130

Telephone: (504) 581-5141

Telefax: (504) 566-1201

E-Mail: hmurphy@dkslaw.com

jfay@dkslaw.com

**Attorneys for Cameron International Corporation,
Cameron France, S.A.S. and Cooper Cameron
Holding (U.K.), Ltd.**

CERTIFICATE OF SERVICE

I certify that this pleading has been served on all parties through their counsel of record as listed below by electronic filing with the court, by e-mail or by placing a copy of same in the U.S. mail, postage prepaid and properly addressed, this 18th day of August, 2009.

Lawrence P. Simon, Jr., Esq. and Matt Jones, Esq., Liskow & Lewis, A P.L.C., 822 Harding Street, P.O. Box 52008, Lafayette, Louisiana 70505 for Nexen Petroleum U.S.A., Inc.

Jon W. Wise, Esq., Fowler Rodriguez Valdes Fauli, 400 Poydras Street, 30th Floor, New Orleans, Louisiana 70130 for Winn Exploration Company, Inc., Riverfront Exploration, L.L.C., National Union Fire Insurance Company of Pittsburgh, Pennsylvania, Zurich American Insurance Company, Munich Re Capital, Ltd., Lloyd's Syndicate No. 457WTK and Lloyd's Syndicate No. 510KLN

Stephanie E. Rennel, Esq., George H. Lugin, Esq. and Allyson L. Wilkinson, Westmoreland Hall, P.C., 2800 Post Oak Boulevard, 64th Floor, Houston, Texas 77056 for St. Paul Surplus Lines Insurance Company, Certain Underwriters and Companies at Lloyd's, London, National Fire and Marine Insurance Company, Zurich American Insurance Company, Liberty Mutual Insurance Company, Stephens Production Company, L.L.C., Energy XXI Gulf Coast, Inc. and Loveless Asset Management, L.L.C.

Frederick T. Haas, III, Esq., Pugh, Accardo, Haas, Radecker, Carey, Loeb & Hymel, L.L.C., Suite 3200 Energy Centre, 1100 Poydras Street, New Orleans, Louisiana 70163-1132 for Coastal Drilling Company, L.L.C. and State National Insurance Company

Michael D. Fisse, Esq. and Jon A. VanSteenis, Esq., Daigle, Fisse & Kessenich, P.L.C., 227 Highway 21, P.O. Box 5350, Covington, Louisiana 70434-5350 for Hydril, L.L.C., Hydril Company, L.P. and Hydril General, L.L.C.

Richard A. Schwartz, Esq. and Suzanna Bonham Phillips, Esq., Schwartz, Junell, Greenberg & Oathout, L.L.P., 909 Fannin Street, Suite 2700, Houston, Texas 77010 for Hydril, L.L.C., Hydril Company, L.P. and Hydril General, L.L.C.

Douglas C. Longman, Jr., Esq., Longman Russo, A P.L.C., P.O. Drawer 3408, Lafayette, Louisiana 70502-3408 for Allis-Chalmers Rental Services, L.L.C. and Allis-Chalmers Energy, Inc.

Charles W. Kelly, Esq., Kelly, Sutter & Kendrick, P.C., 3050 Post Oak Boulevard, Suite 200, Houston, Texas 77056 for Allis-Chalmers Rental Services, L.L.C. and Allis-Chalmers Energy, Inc.

D. Reardon Stanford, Esq., Hoyt & Standford, L.L.C., 315 South College, Suite 165, Lafayette, Louisiana 70503 for Tri City Pipe & Machine, L.L.C.

Michael J. Remondet, Jr., Esq., Jeansonne & Remondet, P.O. Box 91530, Lafayette, Louisiana 70509 for OIL Insurance, Ltd.

Suzanne C. Radcliff, Esq., Cozen & O'Connor, 1717 Main Street, Suite 2300, Dallas, Texas 75201 for OIL Insurance, Ltd.

/s/ John F. Fay, Jr.

John F. Fay, Jr.

#1199008v1<DKS> -79645025.P22.nod Coastal